

ATTACHMENT A

**QUESTIONS WHICH THE PARTIES REQUEST THE COURT
PROPOUND TO THE JURORS CONCERNING LEGAL
QUALIFICATIONS**

1. Do you have any adult children? If so, what are their occupations?
2. What do or did your parents do for a living?
3. Is any juror related by blood or marriage to the Plaintiff, Tony Smith, or any of his family?
4. Is any juror related by blood or marriage to James Marvin Feagle, Justin Holcombe, or any employee of Skaar & Feagle, LLP?
5. Is any juror related by blood or marriage to Gregory Gorski or any employee of Francis & Mailman, P.C.?
6. Is any juror related by blood or marriage to anyone employed by Kilpatrick Townsend & Stockton LLP?
7. Is any juror related by blood or marriage to Craig Kessler or any employee of e-Backgroundchecks.com, Inc. or General Information Services, Inc.?
8. Is any juror related by blood or marriage to Dolly Bergan, Randy Luckow, Peggy O'Neill, or any employee of Dart Transportation, Inc?
9. Is any juror employed or insured by XL Group?

10. Is any juror employed or insured by Indian Harbor Insurance Company?
11. Is any juror employed or insured by One Beacon Professional Insurance?
12. Is any juror employed or insured by Atlanta Specialty Insurance?
13. Is any juror employed or insured by RSUI Group?
14. Is any juror employed or insured by Landmark America Insurance Company?
15. Is any juror employed or insured by Chubb Group?
16. Is any juror employed or insured by Executive Risk Indemnity, Inc.?
17. Is there anyone here who is not a citizen of the United States?
18. Is there anyone here who is not at least 18 years old?
19. Is there anyone here who has not resided for at least one year within the Northern District of Georgia?
20. Is there anyone here who cannot read, write, speak, and understand the English language?
21. Does any juror suffer from any medical or physical infirmity that would prevent them from rendering satisfactory jury service?

22. Have you had any substantial contacts or dealings with attorneys or the legal process or do you have any views about the legal system or lawyers that would impact your ability to be fair and impartial in this case? If so, please (a) describe the contacts/dealings, (b) would these contacts/dealings impact your ability to be fair and impartial in this case?

23. Have you ever served on a criminal jury, civil jury, or the grand jury? If so, please state (a) was it a civil or criminal case? (b) without telling us the outcome, did the jury reach a verdict? (c) would your prior jury service and the outcome of that case impact your ability to be fair and impartial in this case?

24. Have you read or heard anything about this case?

25. If you are selected as a juror, will you be able to render a fair and impartial verdict based solely on the evidence presented at this trial and in accordance with the Court's instructions on the law?

26. Can you accept the law as explained by the Court and apply it to the facts regardless of your personal beliefs about what the law is or should be?

27. The law requires that you decide this case on the facts and not be swayed by any sympathy or passion. Could you put aside all sympathy for any party and decide the case solely on the facts and the law that applies?

28. Plaintiffs are persons who initiate lawsuits and defendants are persons who defend themselves when claims are made against them. Are there any members of the jury who feel, for any reason not discussed, that they could not sit and hear this case and thereafter render a verdict which would be fair to both the Plaintiff and the Defendant under the evidence as it may be presented?

29. Is there any other reason why you cannot be fair to any party in deciding this case?

30. Do you know of any matter that we have not discussed that you feel you should bring to the Court's attention that may have some bearing on your qualifications as a juror or that you feel may prevent you from rendering a fair and impartial verdict based solely on the evidence and the Court's instructions about the law?

31. Have you or has anyone you know ever worked for a court?

32. Do you reside with any other adults? If so, please identify the occupation of each adult with whom you live.

33. What is your educational level? If you attended any schooling after high school, what was your major field of study?

34. Are you related to or are your close friends with any persons in the legal profession such as Judges or lawyers? If so, please: (a) identify the person,

their job, and your relationship with him/her and (b) would your relationship impact your ability to be fair and impartial in this case?